

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA

Case No. 3:18-cr-32 (5)
(Thomas M. Rose, J.)

Plaintiff,

v.

James T. Harmon, et al

Defendants

***James T. Harmon's
Motion for Bond
Modification***

Defendant moves this Court for an Order Modifying his Bond Conditions allowing him to curtail the necessity for drug testing as a condition of bond.

Memorandum

Per his oral request in open court on April 15, 2019, and at the Court's direction, Mr. Harmon moves the Court to amend his bond conditions to curtail the necessity for drug testing. Mr. Harmon informs counsel that the daily call-ins and frequency of drug testing is expensive, time consuming and hard to coordinate with his full work schedule. Additionally, he avers that he has not had any issues or incidents in the year that he has worked within the restrictions of his conditions. He indicates that he has brought these concerns to the attention of his pre-trial officers, and he says they indicate that they would not commit their preferences to him, but to the court upon filing of a Motion to Modify.

nor have there ever been in his past.

Given that he has not had any issues meeting his bond conditions, violated any laws and considering the possible length of time looming before trial or resolution of his case, he believes the request herein is reasonable.

Defendant requests this Motion be granted in a timely fashion to allow Mr. Harmon to fulfill these requests.

Respectfully Submitted,

s/Michael L. Monta
MICHAEL L. MONTA [0032777]
3625 Old Salem Road
Dayton, Ohio 45415
Ph: (937) 890-6921
FAX: (937) 890-6922
E-mail: Zbeard7@aol.com
Attorney for James T. Harmon

CERTIFICATE OF SERVICE

__ I hereby certify that a copy of this Motion was electronically served on the United States Attorney, Amy M. Smith and other Counsel of record, on the same date of filing with the court.

S/Michael L. Monta
MICHAEL L. MONTA
Attorney for Defendant James T. Harmon